

WYR 000215053

Wyoming Commercial Oilfield Waste Disposal Facilities  
OGEA(T) RCRA Program Site Visits  
Trip Report for October 11-13, 2016

As part of an ongoing effort between the U.S. EPA Region 8, U.S. FWS Region 6 and various other federal and state governmental entities (e.g. Bureau of Land Management [BLM], state oil and gas commissions) the Oil and Gas Environmental Assessment Team (OGEA[T]) initiative was undertaken in the mid-1990s in the states of Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming. Multi-agency OGEA(T) inspections were primarily conducted in Wyoming in the summer of 1997. Based upon the findings, initial and numerous follow-up inspections have been conducted by representatives of the U.S. EPA, U.S. FWS, BLM, the Wyoming Department of Environmental Quality (WDEQ) and the Wyoming Oil and Gas Conservation Commission (WOGCC) since that initial summer.

From an OGEA(T) standpoint, the U.S. EPA RCRA program, although authorized to the states, retains primacy for RCRA §7003 – Imminent and Substantial Endangerment. The U.S. EPA and the U.S. FWS have primacy in regard to the OPA/SPCC program and the Migratory Bird Treaty Act (MBTA) respectively.

In light of the background information provided above, the following constitutes a brief summary of RCRA program related environmental findings at a Wyoming commercial oilfield waste disposal facility (COWDF) visited during an October 11-13, 2016 inspection trip.

**Grasslands COWDF (WYR000215053)**

Date: October 13, 2016

Time in: 9:50 am, Time out: 10:25 am

Location: Converse County, WY N of Bill, WY

GPS Location: 43.2535, -105.2744

Participants: Annette Maxwell (USEPA), Randy Lamdin (USEPA), Kim Dickerson (USFWS), Dennis Lamb (WDEQ), Hannes Stueckler (WDEQ), and Jerry Hamel (Grasslands).

- A RCRA/MBTA inspection was conducted as a follow-up to a May 29, 2015 OGEA inspection.
- The USEPA/USFWS/WDEQ inspectors observed facility signage, four large evaporation ponds, a netted skim/slop pit, tank batteries and a vacuum truck offloading area.
- The slop skim pit has had a leak for some time and has been out of service; netting was ¼ off after the facility attempted to use a new, lighter netting that was destroyed by the wind; they planned to completely reinstall the netting.
- Aerators were working in the evaporation ponds; no freeboard issues noted.
- This location manages more solids than other COWDFS, and has a separate, special waste landfill at a nearby location.
- No standing or pooled oil were observed in tank battery containment.
- No mortalities of birds or wildlife were observed.
- No photographs were collected.

Prepared by:

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3/28/2017

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Date